

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**JOINDER OF THE PRIVATE INSURANCE RATEPAYERS  
TO OPPOSITION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
TO MOTIONS FOR STAY PENDING APPEAL**

Eric Hestrup, *et al.* (collectively, “Private Insurance Plaintiffs”), in their individual and representative capacities (and with the class members, collectively, the “Private Insurance Ratepayers”) in their respective actions, join in the Objection of the Official Committee to the (i) *Amended Memorandum of Law in Support of United States Trustee’s Amended Expedited Motion for a Stay of Confirmation Order and Related Orders Pending Appeal Pursuant to Federal Rule of Bankruptcy Procedure 8007* [ECF No. 3801] (the “U.S. Trustee Motion”); (ii) *Motion of the States of Washington and Connecticut for a Stay Pending Appeal* [ECF No. 3789] (the “CT/WA Motion”); (iii) *State of Maryland’s Motion for Stay of Confirmation Orders [3786, 3787] and Trust Advances Order [3773] Pending Appeal* [ECF No. 3845] (the “MD Motion” and, Maryland together with Washington and Connecticut, the “Three Attorneys General”); (iv) the *Notice of Presentment of Joint Motion of Certain Canadian Municipality*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

*Creditors and Appellants and Certain Canadian First Nations Creditors and Appellants for the Granting by the Bankruptcy Court of a Stay Pending Appeals, Joinder to the Stay Motions of the Office of the United States Trustee and the State of Maryland, and Granting Related Relief* [ECF No. 3873] (the “CMFN Motion”); and (v) *Second Amended Memorandum of Law in Support of United States Trustee’s Amended Expedited Motion for a Stay of Confirmation Order and Related Orders Pending Appeal Pursuant to Federal Rule of Bankruptcy Procedure 8007* [ECF No. 3972] (the “U.S. Trustee Second Amended Motion” and, collectively with the U.S. Trustee Motion, the CT/WA Motion, the MD Motion, and the CMFN Motion, the “Stay Motions”)<sup>2</sup> (the “Committee Objection”).<sup>3</sup>

The Private Insurance Ratepayers hereby join in the Committee Objection and incorporate the Official Committee’s arguments made therein. The Private Insurance Ratepayers respectfully submit that the Stay Motions should be denied for the reasons stated in the Committee Objection.

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<sup>2</sup> The Official Committee also opposes the requests for a stay filed by Ronald S. Bass, Sr., which raises no argument in support of a stay, and by Ellen Isaacs, which adopt the arguments set forth by Washington and Connecticut. *See Ronald Bass, Sr. Letter* [ECF No. 3860]; *Motion of Ellen Isaacs, Deceased Patrick Ryan Wroblewski & the American People for a Stay Pending Appeal* [ECF No. 3890].

<sup>3</sup> Capitalized terms not defined herein have the meanings ascribed thereto in the Committee Objection.

Respectfully submitted,

Dated: October 22, 2021

By: /s/Nicholas F. Kajon  
One of the Attorneys for Private Insurance  
Ratepayers

Nicholas F. Kajon  
Nicholas.kajon@stevenslee.com  
Constantine D. Pourakis  
constantine.pourakis@stevenslee.com  
STEVENS & LEE, P.C.  
485 Madison Avenue, 20th Floor  
New York, NY 10022  
Tel: 212.319.8500

James Young\*  
jyoung@ForThePeople.com  
MORGAN & MORGAN, P.A.<sup>4</sup>  
COMPLEX LITIGATION GROUP  
76 S. Laura St., Suite 1100  
Jacksonville, FL 32202  
Tel: 904.361.0012

Juan R. Martinez\*  
juanmartinez@ForThePeople.com  
MORGAN & MORGAN, P.A.  
COMPLEX LITIGATION GROUP  
201 N. Franklin Street, 7th Floor  
Tampa, Florida 33602  
Tel: 813.223.5505

*\*Admitted Pro Hac Vice*

*Counsel for Private Insurance Ratepayers*

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<sup>4</sup> Morgan & Morgan, P.A. also represent clients in diverse other matters pending against Debtors, as specified in the Amended Verified Statement of Stevens & Lee, P.C. Pursuant to Bankruptcy Procedure 2019, dated October 21, 2019. [Dkt. No. 333].